#### IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ETIMINE USA INC.,	)
Plaintiff,	)
vs.	) Civil Action No. 2:20-cv-713
GOKHAN YAZICI, and YZC CONSULTING LTD.,	) JURY DEMAND
Defendants.	)

#### MOTION FOR ADMISSION PRO HAC VICE OF MEHMET BAYSAN

Mehmet Baysan, undersigned counsel for Plaintiff Etimine USA, Inc. ("Etimine USA"), hereby moves that he be admitted to appear and practice in this Court in the above-captioned matter as counsel pro hac vice for Plaintiff Etimine USA in the above-captioned matter pursuant to LCvR 83.2 and LCvR 83.3 and this Court's Standing Order Regarding Pro Hac Vice Admissions dated May 31, 2006 (Misc. No. 06-151).

In support of this motion, undersigned counsel attaches the Affidavit for Admission *Pro* Hac Vice of Mehmet Baysan filed herewith, which, it is averred, satisfies the requirements of the foregoing Local Rules and Standing Order.

Respectfully submitted,

Dated: 18th day of May, 2020 /s/ Mehmet Baysan

> Mehmet Baysan (NY 4922159) BREEDING HENRY BAYSAN PC 7 World Trade Center 250 Greenwich Street, 46th Floor New York, New York 10006 Tel: 212-813-2292

Fax: 865-670-8536 mbaysan@bhblegal.com

Counsel for Plaintiff Etimine USA, Inc.

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Plaintiff,	)
VS.	Civil Action No. 2:20-cv-713
GOKHAN YAZICI, and YZC CONSULTING LTD.,	) ) JURY DEMAND )
Defendants.	)

### AFFIDAVIT OF MEHMET BAYSAN IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

I, Mehmet Baysan, make this affidavit in support of the motion for my admission to appear and practice in this Court in the above-captioned matter as counsel *pro hac vice* for Plaintiff Etimine USA, Inc. ("Etimine") pursuant to LCvR 83.2 and LCvR 83.3 and this Court's Standing Order Regarding *Pro Hac Vice* Admissions dated May 31, 2006 (Misc. No. 06-151).

- I, Mehmet Baysan, being duly sworn, do hereby depose and say as follows:
  - 1. I am a Partner in the law firm of Breeding Henry Baysan PC.
  - My business address is 7 World Trade Center, 250 Greenwich Street, 46 Floor, New York, New York 10006.
  - 3. I am a member in good standing of the bar of the state of New York.
  - 4. My bar identification number is NY 4922159.
  - 5. I am also a member in good standing of the following bars:
    - a. Commonwealth of Massachusetts;
    - b. United States District for the Southern District of New York;

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c. United States District for the Eastern District of New York; and

d. United States District for the District of Massachusetts.

6. As my primary bar of practice, a current certificate of good standing from the

Appellate Division of the Supreme Court of the State of New York, is attached to

this Affidavit as Exhibit 1.

7. I attest that I am a registered user of ECF in the United States District Court for

the Western District of Pennsylvania.

8. I attest that I have read, know and understand the Local Rules of Court for the

United States District Court for the Western District of Pennsylvania.

9. Based upon the foregoing, I respectfully request that I be granted pro hac vice

admission in this matter.

I certify and attest that the foregoing statements made by me are true. I am aware that if any of

the foregoing statements made by me are false, I am subject to punishment.

Dated: 18th day of May, 2020

/s/ Mehmet Baysan

Mehmet Baysan (NY 4922159)

#### **CERTIFICATE OF SERVICE**

I, Mehmet Baysan, an attorney, certify that on May 18, 2020, I served the foregoing by causing true and accurate copies of such paper to be filed and transmitted to all counsel of record via the Court's CM/ECF electronic filing system.

/s/ Mehmet Baysan
Mehmet Baysan (NY 4922159)

# Exhibit 1



## State of New York Supreme Court, Appellate Division Third Judicial Department

I, Robert D. Mayberger, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that

# Mehmet Baysan

having taken and subscribed the Constitutional Oath of Office as prescribed by law, was duly licensed and admitted to practice by this Court as an Attorney and Counselor at Baw in all courts of the State of New York on the 13th day of April, 2011, is currently in good standing and is registered with the Administrative Office of the Courts as required by section four hundred sixty-eight-a of the Judiciary Baw.

In Witness Whereof, I have hereunto set my hand and affixed the Seal of said Court, at the City of Albany, this 29th day of May, 2019.



Robert D Mayberger

Clerk